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OCT 28 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 28, 1998

BY HAND DELIVERY

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
1919 M Street, N.W., Suite 222
Washington, D.C. 20554

Attention: International Bureau

Re: IB Docket No. 98-172
Motion for Extension of Pleading Cycle

Dear Ms. Salas:

Enclosed are an original and four copies of a Motion for Extension of Pleading Cycle in the above-referenced docket. Please direct any questions regarding this matter to my attention at 202/637-2132. Thank you.

Sincerely,



Arthur S. Landerholm
of LATHAM & WATKINS

Enclosures

cc: Thomas Tycz
Cassandra Thomas
Fern Jarmulnek
Charles Magnuson
Diane Garfield

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OCT 28 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Redesignation of the 17.7-19.7 GHz
Frequency Band, Blanket Licensing of
Satellite Earth Stations in the 17.7-20.2 GHz
and 27.5-30.0 GHz Frequency Bands, and the
Allocation of Additional Spectrum in the
17.3-17.8 GHz and 24.75-25.25 GHz
Frequency Bands for Broadcast Satellite-
Service Use

IB Docket No. 98-172
RM-9005
RM-9118

MOTION FOR EXTENSION OF PLEADING CYCLE

Pursuant to Section 1.46 of the Commission's rules, the undersigned hereby request a two week extension of the pleading cycle in the above-referenced proceeding. Upon grant of this motion, comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM") would be due on November 19, 1998 and reply comments would be due on December 21, 1998. The requested extension is amply justified, will prejudice no likely party in the proceeding, and will serve the public interest.

As the Commission is aware, the Petition for Rulemaking in this proceeding and the comments filed in response to that Petition initiated two parallel industry working groups -- a GSO-satellite-only group studying the blanket licensing of earth stations in the GSO FSS bands and a group comprised of both satellite and terrestrial fixed service interests studying the blanket licensing of earth stations in the FS parts of the Ka band. This latter group is commonly referred

to as the 18 GHz Joint Working Group ("JWG").¹ Both of these groups have met regularly since Fall 1997.

The GSO-satellite working group has made considerable progress toward developing a consensus regime for blanket licensing in the GSO FSS primary bands at Ka band. However, a two week extension of the comment deadline is necessary to allow the GSO-satellite working group to attempt to complete its discussions and negotiations and finalize its consensus report to the Commission. A consensus report would be valuable to the industry and the Commission and would be a more efficient method of developing an appropriate blanket licensing regime than the filing of separate proposals by each of the GSO licensees.

Likewise, the 18 GHz JWG believes that a brief two week extension would allow it to wrap up its discussions regarding a possible recommendation of band segmentation. Indeed, given the breadth and depth of the issues addressed in the NPRM, and the technical nature of several of the issues, the two-week extension will likely be a benefit to any party intending to comment on the NPRM. As such, the requested extension is unlikely to prejudice any party to this proceeding.

The requested extension will facilitate the completion of discussions among the Ka Band GSO FCC licensees regarding a potential consensus blanket licensing regime, will facilitate the completion of discussions among the 18 GHz JWG regarding a possible consensus band segmentation plan, will permit all commenters to fully address the many technical issues in

¹ For the Commission's information, a list of the participants at the most recent 18 GHz JWG meeting is included as Exhibit A.

the NPRM, and is unlikely to prejudice any party to this proceeding. As such, the requested extension is in the public interest and should be granted.

Respectfully submitted,

18 GHZ JOINT WORKING GROUP

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ast

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Exhibit A

Companies and Organizations represented at the
October 22, 1998 18 GHz JWG Meeting

All Communication Technologies, Inc.
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Tadiran Microwave
Digital Microwave Corporation
Alcatel
Verner, Lipfert et al
Airtouch
AESCO Systems
Telecom Strategies
Lockheed Martin Astrolink
Loral
AT&T
Comsearch
Optel
Steptoe & Johnson
Motorola
KaStar
PanAmSat
Bell, Boyd & Lloyd
Willkie Farr
Hughes
GE Americom
HWG
WinStar
NASA Lewis Labs
National Spectrum Managers Association (NSMA)
TIA Orbit Utilization Section
TIA Fixed Point-to-Point Microwave Section